

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

NSTAR ELECTRIC, D.T.E. 03-121

**FIRST SET OF INFORMATION REQUESTS OF
THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO
THE JOINT SUPPORTERS**

Pursuant to 220 C.M.R. 1.06(6)(c), the Department of Telecommunications and Energy ("Department") hereby submits to the Joint Supporters the following information requests with respect to the above captioned matter.

Instructions

The following instructions apply to this set of information requests and all subsequent information requests issued by the Department to the Solar Energy Business Association of New England in this proceeding.

1. "JS@ means the Joint Supporters, its members, employees, consultants, and attorneys.
2. Each request should be answered in writing on a separate page with a recitation of the request, and with a reference to the request number (for example, DTE-JS-1-1), the docket number of the case, and the name of the person responsible for the answer. Please submit all responses on three-hole punched paper.
3. Please do not wait for all answers to be completed before supplying answers, but instead please provide the answers as they are completed.
4. These requests shall be deemed continuing so as to require further supplemental responses if the Joint Supporters or its witnesses receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
5. The phrase "provide complete and detailed documentation" means provide all data, assumptions, and calculations on which the response relies; provide the source of and basis for all data and assumptions employed; include all studies, reports, and planning documents from which data, estimates, or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates; and provide and explain all supporting workpapers.
6. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills,

checks, articles from journals or other sources, and other data compilations from which information can be obtained, and all copies of such documents that bear notations or other markings that differentiate such copies from the original.

7. If the Joint Supporters finds that any of these requests is ambiguous, please notify the hearing officer so that the requests can be clarified prior to the preparation of a written response.
9. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department. Please also submit the responses directly to: (1) William Stevens, Legal Division; (2) John Cope-Flanagan, Legal Division; (3) Jeff Hall, Rates and Revenue Requirements Division; (4) Claude Francisco, Rates and Revenue Requirements Division; (5) Sean Hanley, Rates and Revenue Requirements Division; and (6) Xuan Yu, Rates and Revenue Requirements Division.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

NSTAR ELECTRIC, D.T.E. 03-121

**FIRST SET OF INFORMATION REQUESTS OF
THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO
THE JOINT SUPPORTERS**

Information Requests

Information Requests Related to the Pre-filed Testimony of Mark B. Lively

DTE-JS-1-1 Refer to the Direct Testimony of Mark B. Lively at 20, lines 489-491. Please give concrete examples of clear rules for any call for interruption. Please cite to any such rules that already exist in the standby tariffs of any distribution company.

Information Requests Related to the Pre-filed Testimony of David Hannus

DTE-JS-1-2 Refer to the Direct Testimony of David Hannus at 10, line 8. Please list the revisions and clarifications referenced in your testimony. Explain how these revisions and clarifications can be incorporated into the proposed NSTAR Electric standby tariffs.

DTE-JS-1-3 In reference to the testimony of David Hannus at 3, lines 13-16, please describe each factor considered by Co-Energy America as the basis for the statement that the service territories of the NSTAR affiliates provide one of the most favorable economic climates in the country for distributed generation (ADG@/on-site generation (AOSG@).

DTE-JS-1-4 In reference to the testimony of David Hannus at 4, lines 4-6, please provide a schedule that shows the following information for each of the indicated 28 DG/OSG projects:

- (a) the location of the project and name of the utility service territory (BEC, Cambridge, or Commonwealth);
- (b) number of generating units and nameplate kW rating of each unit;
- (c) completion date or projected date of completion;
- (d) type of customer (e.g., schools, hospitals);
- (e) type of project (peak shaving, load following, 24-hour/7-day per week operation);
- (f) capacity factor.

Dated: March 26, 2004